

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL RECORDS

In the Matter of)
)
Federal-State Joint Board on)
Universal Service)

CC Docket No. 96-45

COMMENTS OF THE IOWA COMMUNICATIONS NETWORK

The Iowa Communications Network (ICN) is a state of Iowa agency dedicated to the integration of telecommunications and technology into education and public services within Iowa. The ICN owns and operates an advanced fiber optic network, that serves citizens of the state of Iowa through the provision of deeply discounted telecommunications services to educational facilities, including K-12 schools, entities of higher education and libraries, public sector agencies of the state and federal governments, and urban and rural health care providers throughout the state of Iowa. The ICN has operated since 1992, and offers comments based on its experience gained in serving designated advanced communications needs in Iowa, which mirror exactly the uses targeted by Section 254 of the Telecommunications Act of 1996.

Our portfolio of services includes full motion interactive video, high speed data transport, Internet services, and standard equal access voice services. Additionally, the Code of Iowa requires equal access to all users throughout the state of Iowa, at equal costs. Currently, the ICN's rate structure offers video services at \$5.00 per hour per site, for educational usage, up to \$40.00 per hour per site for health care usage. These rates are significantly lower than the charges for similar services offered by private sector telecommunications providers. The video rates charged to users of the ICN are based on "ongoing operational costs only."

The ICN asks recognition of its experiences in providing discounted advanced telecommunications services to schools, libraries, and health care providers. We offer comments on: (1) the scope and definition of telecommunications carriers; (2) the composition of universal services for schools, libraries, and health care providers; and (3) the administration of the fund.

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SCHOOLS, LIBRARIES, AND RURAL HEALTH CARE PROVIDERS

The major point the ICN would like to impress upon the Commission as it considers rules to implement the universal service fund portion of the Telecommunications Act of 1996 is that the ICN is a leader in the provision of discounted advanced telecommunications services to schools, libraries, and health care providers. Our charter is dedicated to the same principles targeted by Section 254. Accordingly, we feel that the Commission should adopt rules broadly enough to include, in the definition of "telecommunications carrier", those non-traditional special purpose carriers, such as the ICN, that have been created as public institutions to achieve purposes in harmony with those of the Telecommunications Act of 1996. Allowing for the inclusion of those entities, such as the ICN, in the definition of a telecommunications carrier will allow for those special purpose carriers to be treated like all other telecommunications carriers, and will make each of those entities eligible for reimbursement under Section 254(h)(B)(ii).

The second point that the ICN would like to impress upon the Commission as it considers rules to define universal services is that this definition should include certain advanced telecommunications services that are fundamental to educators and health care providers in the state of Iowa. Through the ICN, Iowa has embarked on a plan to offer advanced telecommunications services to facilitate distance learning and coordinated Internet services to all school districts in the state by the year 1999. Currently, there are nearly 300 full motion interactive video classrooms, located in all 99 counties of the State. By June of the year 1999, it is expected that the number of classrooms will expand to over 700. The ICN also has a number of urban and rural health care providers utilizing advanced telecommunications services throughout the state, including full motion interactive video services and high speed compressed video services. These services are being deployed by health care providers in the field of patient consultations, diagnostic services, residency training, nurses training, etc. In order for these uses to continue to grow in the state of Iowa, the ICN would like to urge the Commission to define universal services as: advanced telecommunications services, to include symmetrical facilities for full motion interactive video, high speed data transport, Internet services, and standard equal access voice services. Furthermore, it is the ICN's position that the Commission should adopt rules that will encourage single transport solutions.

Paragraph 81 of the Notice requested comment on the use of wireless technologies as a method of providing more efficient service delivery. With respect to this inquiry, it has been the ICN's experience that wireless technology offers difficulties in both the ability to equip advanced services with multiple channels, and also, in the ability to acquire frequency licensing in some areas. Because of the difficulties inherent in wireless technology, the ICN does not support this delivery mechanism. Accordingly, the ICN requests that the Commission adopt rules that discourage wireless technology as a delivery platform.

ADMINISTRATION OF THE FUND

The ICN supports a single non-governmental fund administrator to facilitate the administration of the universal service fund. The point the ICN would like to impress upon the Commission, however, is that the selected fund administrator should have equal representation of all telecommunications providers, including local exchange carriers and limited access (special purpose) carriers. It is imperative to have board representation and/or affiliation with all telecommunications carriers, as defined by the Commission pursuant to the Telecommunications Act of 1996. Such representation will offer the means by which the fund administrator can operate in an efficient, fair, and competitively neutral manner.

CONCLUSION

In conclusion the ICN supports: (1) allowing non-traditional, special purpose telecommunications carriers, such as the ICN, to be considered telecommunications carriers eligible to receive reimbursement under Section 254 (h)(B)(ii); (2) a broad definition of universal services to include single transport, symmetrical facilities for the transmission of full motion interactive video services, high speed data transport, Internet services and standard equal access voice services; and (3) a single non-governmental fund administrator that is neutral in its affiliations.

Respectfully submitted,

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